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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

12 **In the Matter of the Seizure of:**

13 Any and all funds held in Republic Bank
14 of Arizona Account(s) xxxx1889,
15 xxxx2592, xxxx1938, xxxx2912, and
16 xxxx2500.

CASE NO.2:18-cv-6742-RGK (MAAx)
18-MJ-00722-PJW

[Related to Case Nos. 18-MJ-00712,
18-MJ-00713, 18-MJ-00715,
18-MJ-00716, 18-MJ-00718,
18-MJ-00719, 18-MJ-00720,
18-MJ-00721, 18-MJ-00723,
18-MJ-00724, 18-MJ-00751,
18-MJ-00797, 18-MJ-00798,
18-MJ-00996, 18-MJ-00997,
18-MJ-01427, and 18-MJ-1863]

17 NOTICE OF MOTION AND MOTION
18 FOR RELEASE OF CERTAIN
19 UNTAINTED FUNDS

20 (First request)
21 (Oral Argument Requested)

22
23 Claimant Michael Lacey, by and through Paul J. Cambria, Jr., and the attached
24 memorandum of points and authorities and declarations and attachments, hereby
25 moves this Court for an order requiring the government to release certain untainted
26 funds which were improperly seized, as well as an accelerated hearing of the instant
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NOTICE OF MOTION AND MOTION
 FOR RELEASE OF CERTAIN
 UNTAINTED FUNDS

(First request)
 (Oral Argument Requested)

Claimant Michael Lacey, by and through Paul J. Cambria, Jr., and the attached memorandum of points and authorities and declarations and attachments, hereby moves this Court for an order requiring the government to release certain untainted funds which were improperly seized, as well as an accelerated hearing of the instant

1 motion. This motion is based on the legal reasoning and authority set forth in the
2 attached memorandum of points and authorities.

3 DATED: August 10, 2018 Respectfully Submitted,
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5 /s/ Paul J. Cambria, Jr.
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